

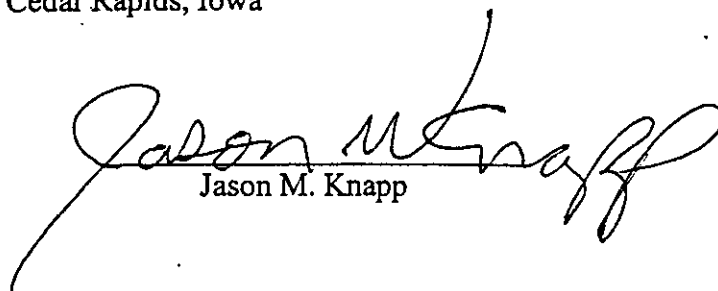
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PUBLIC VERSION

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I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct to the best of my knowledge.

Dated this 15th day of April, 2003 at Cedar Rapids, Iowa


Jason M. Knapp

* * *

PUBLIC VERSION

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**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Rulemaking on the Commission's Own Motion to
Govern Open Access to Bottleneck Services and
Establish A Framework for Network Architecture
Development of Dominant Carrier Networks

Rulemaking 93-04-003
(Filed April 7, 1993)

Investigation on the Commission's Own Motion into
Open Access and Network Architecture Development of
Dominant Carrier Networks

Investigation 93-04-002
(Filed April 7, 1993)

**DECLARATION OF EDWARD J. CAPUTO
IN SUPPORT OF COMMENTS OF
LSSI CORP., METRO ONE TELECOMMUNICATIONS, INC., AND WORLDCOM,
INC., CONCERNING SBC CALIFORNIA'S DIRECTORY ASSISTANCE LISTING
INFORMATION SERVICE**

I. QUALIFICATIONS OF EDWARD J. CAPUTO

1. My name is Edward J. Caputo. I am Director of Operator and Directory Services for MCI WorldCom, Inc. ("WorldCom"). My business address is 22001 Loudoun County Parkway, Ashburn, Virginia 20147.
2. I attended the University of Maryland in College Park, Maryland and earned a Bachelor of Science degree in Business Management.
3. I have held management positions in the telecommunications field for the last 11 years. Prior to that, I held management positions in the information technology and finance field. I have had management responsibilities at WorldCom and its predecessor entity, MCI, since 1990 in the area of operator and directory services.

II. PURPOSE OF DECLARATION

4. I have been asked by WorldCom to address certain issues related to directory assistance listings. In this declaration I (1) give a general description of the industry and why LECs are required to provide nondiscriminatory access to their directory assistance listings; (2) describe how the listings are generated and the process involved in making them available to DA providers such as WorldCom; (3) describe how WorldCom incorporates those listings into its own national directory assistance database; and (4) describe WorldCom's experiences with SBC California and the industry as a whole.

III. DISCUSSION

A. Access to Directory Assistance Listings

5. WorldCom receives DALIS from every major ILEC and some smaller ILECs throughout the country. Of these **BEGIN WorldCom PROPRIETARY*** END WorldCom PROPRIETARY***** different DALIS providers, there are over **BEGIN WorldCom PROPRIETARY*** END WorldCom PROPRIETARY***** different data feeds, but the process is relatively the same with only some minor differences. Historically, ILECs allowed only per-dip or per listing access to their databases and sometimes these ILECs would discriminate against other LECs by offering their listings at different rates or terms to certain LECs than others. Federal law and the FCC now require nondiscriminatory access to these databases, and require ILECs to offer batch or download access to their directory assistance listings. WorldCom's goal is to have the

same listings available to its operators and ultimately, its customers, that SBC California has available to its customers.

6. The directory assistance marketplace has only begun to flourish under this regulatory framework. Although ILECs, by virtue of their incumbent position in the local market have the most comprehensive directory assistance listings database for their region (e.g. California), allowing CLECs and other DA providers to compete on a level, nondiscriminatory, playing field has yielded tangible results. For example, directory assistance was once known as "Directory Resistance", and complaints from customers were high because of the poor quality of the information and the poor value to consumers. Once WorldCom and other DA providers were allowed to provide a competitive alternative, the quality improved and new markets and the industry are now developing new services including caller identification and call completion services based on the directory assistance information. As I explain in more detail below, WorldCom continues to verify the integrity of the listings it receives from SBC California and other ILECs because it is committed to providing its customers with the best, most up-to-date information it can get. Without this competitive pressure, SBC California would have less incentive to keep its data accurate. In fact, even when we provide information regarding data errors, the changes take days or weeks to show up in the data feeds.

B. The Directory Assistance Listings Process

7. Incumbent local exchange carriers ("ILECs") like SBC California generate their directory assistance listings ("DAL") from the service order process when a customer signs up for new service. Name and address information is garnered from the service order and used to populate the DAL database along with the corresponding line number.
8. SBC California also uses subscriber listing information from CLECs such as WorldCom to populate both its directory assistance database as well as its directory publishing database. CLECs such as WorldCom give their listings to SBC California at no cost so that these numbers get published in the printed directories by the ILECs. *See, Interconnection Agreement Under Sections 251 and 252 of the Telecommunications Act of 1996 by and Between Pacific Bell and MCI Metro Access Transmission Services, LLC.*, Appendix WP (White Pages), § 2. WorldCom buys back its own listings from SBC California when it receives the DALIS.
9. WorldCom first receives an initial load of the listings from the provisioning LEC. The initial load is a "snapshot" or copy of the listings in the provisioning LECs database at any one time. Before receiving the initial load, network routing, and other database peculiarities or technical issues are worked out between the receiving DA provider or LEC and provisioning LEC. Once the parameters are agreed upon, a programmer creates a computer program that queries the database and gathers all the appropriate listings in the database.

10. As the ILEC's customers change, so does the directory assistance listing information. Accordingly daily updates to the database are provided to the receiving DA provider or LEC. These update files are created using a software process that is created once but scours the provisioning LEC's database for changes made every business day. The resulting data file is generally a small percentage of the total listings. Containing new listings and a record of those records that should be deleted. Daily updates are generally sent Monday through Friday except holidays.
11. The resulting data in the initial load or subsequent daily updates is offered in a format specific to the provisioning LEC unless specifically requested by the receiving DAL provider or LEC. WorldCom has not requested any change in database format since it initiated DALIS with SBC California.
12. The provisioning LEC sends the initial load or daily update files to WorldCom electronically, using a network protocol known as Connect:Direct ("C:D"). The NDM or "network data mover" protocol was also used until recently. WorldCom has always advocated the use of this or other electronic protocols for the delivery of the database rather than having the data delivered by courier on computer tapes. Even though WorldCom pays for the network lines that carry the information, an electronic format is far more cost effective, faster and more reliable. Historically, ILECs have been slow to adopt electronic delivery methods. However, WorldCom presently does not receive any

listings in a tape format, nor does it intend to move away from electronic delivery methods.

13. Once WorldCom receives either the initial load or the update file, a programmer creates a computer program to convert the SBC California DALIS format into the MCI format so that a database capable of queries can be created. While a change in data format might be possible from SBC California, MCI WorldCom has not requested any database format changes since it initiated DALIS with SBC California; it relies on its own conversion processes.
14. Occasionally, integrity problems arise with either the data sent by the provisioning LEC or the DAL provider or the LEC's database. In those instances, the DAL provider or LEC requires a "refresh" of the data, which is akin to a current initial load, without all the preliminary tasks associated with the initiation of service. A refresh is easier to accomplish than correcting potentially millions of records individually and, in the case where the ILEC provider's data is corrupted, is performed once the data has been fixed. WorldCom has never requested a refresh of the SBC California database.

C. WorldCom's Directory Assistance Experience

15. MCI WorldCom has its own computers, programmers and staff that operate and maintain the WorldCom directory assistance database containing approximately BEGIN

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listings from all ILECs nationwide. Although WorldCom does not output the data in exactly the same manner, WorldCom encounters some of the same logistical and technical issues experienced by ILECs such as SBC California as it integrates and re-formats the data for use by its own operators and customers.

16. WorldCom Mainframe Development is responsible for receiving and processing the DALIS listings from SBC California. They use a job scheduler called CA-7 that completely automates the scheduling of all DALIS processes. Mainframe developers spend no time watching any database processes.
17. WorldCom Mainframe Development could easily apply the same simple DALIS functions performed by SBC California described above to WorldCom's nationwide database. These processes are common and well understood by most ILECs from which WorldCom receives its data.
18. While WorldCom's data processes are largely automated, it employs a full time staff of **BEGIN WorldCom PROPRIETARY*** END WorldCom PROPRIETARY***** employees to oversee its nationwide database. The staff consists of **BEGIN WorldCom PROPRIETARY*****

END WorldCom PROPRIETARY***

I would expect that a regional operation, as opposed to WorldCom's national service,

could do the same functions on a much smaller scale. As opposed to SBC California,

WorldCom works with over **BEGIN WorldCom PROPRIETARY*****

END WorldCom PROPRIETARY*** listings, **BEGIN WorldCom**

PROPRIETARY*** **END WorldCom PROPRIETARY***** different providers of

data and over **BEGIN WorldCom PROPRIETARY***** **END WorldCom**

PROPRIETARY*** different data feeds per day, and WorldCom converts these myriad

data formats into useable listings for all of WorldCom's data customers and its operator

platform. By contrast, SBC California simply provides requesting DA providers and

LECs with a copy of their listings, in their own format, with no guarantee that the listings

they provide are even accurate.

19. WorldCom routinely runs integrity checks of the data it receives from SBC California and other provisioning LECs. Between integrity checks and customer complaints it receives, WorldCom identifies individual or localized problems with the data and brings them to SBC California's attention. WorldCom brings these problems to SBC California's attention so that a subsequent update will reflect the change and hopefully correct the problem, although it may take days or even weeks for the problems to disappear from the daily updates. Thus SBC California directly benefits from the information it receives from WorldCom and other DA providers who perform integrity checking in this context.

D. SBC California Service

20. I have been asked to comment on the level and type of service WorldCom has received from SBC California. Although it has been my experience that WorldCom has encountered very few problems with data received from SBC California, this is not true for SBC as a whole. SBC ILECs such as SWBT and Ameritech have major data integrity issues that have continued for months and years. Since SBC took over these ILECs, it is my understanding that they have consolidated their personnel that deal with these issues so that they do not address only SBC California issues. For example, while WorldCom used to have contacts at all the individual SBC ILECs, SBC now insists we deal with one account manager, Josh Smith, for all of our data issues.
21. Individual listing integrity issues are really the only type of situation where we deal with SBC California on any regular basis. Other potential issues might include data format or daily data feed issues that might arise. Again, while these issues arise more frequently with other ILECs, they generally do not arise with SBC California. It is most often the case that problems arise when an ILEC provider like SBC California changes its data format or feed schedule to suit its own needs rather than those of WorldCom. Although SBC might refer to WorldCom as its "customer", the relationship is generally more adversarial than customer service oriented.
22. WorldCom utilizes mainframe computers to store and service its nationwide directory assistance listings. The space required to house the SBC California listings, however, takes as little as **BEGIN WorldCom PROPRIETARY***** **END**

WorldCom PROPRIETARY*** of computer storage. A copy of the database can be made in a manner of seconds and the daily updates can be integrated and reformatted in a matter of minutes. Although I understand that the cost of CPU time depends on the type of computer, based on representations from WorldCom's vendor, I have determined that WorldCom pays under **BEGIN WorldCom PROPRIETARY *** *** END**

WorldCom PROPRIETARY per hour for CPU time – a rate that would presumably include compensation for all of the vendor's overhead costs such as building space and power requirements.

23. WorldCom used midrange computers before it upgraded to a mainframe platform. Using a mainframe platform allows WorldCom to perform other tasks besides just gathering and outputting directory assistance listing data for use by our operators and data customers. Given that the data for SBC California comprise only about **BEGIN WorldCom PROPRIETARY***** **END WorldCom PROPRIETARY***** of data, however, it is my professional opinion that even a low-end midrange computer would be adequate to process this isolated number of listings in under an hour.

24. Carriers and DA providers have largely automated both the initial load and daily update process as the computer equipment and electronic storage has become cheaper and more cost effective and computer databases have become more sophisticated. Moreover, LECs often integrate the directory assistance listings database with other databases on large computer systems to facilitate making changes and providing the data quickly and

efficiently to their own operators or other customers. WorldCom, for example, used midrange computers to house its directory assistance database, but subsequently consolidated this database to a mainframe computer system to facilitate integration with its internal systems, its directory assistance platform, and its customers. More importantly, the mainframe computers also perform other services unrelated to directory assistance listings.

E. Industry Observations

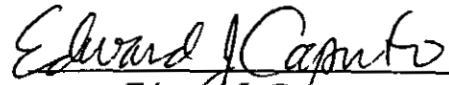
25. Overall, the directory assistance process has been standardized and is more streamlined today than it was a few years ago. Despite the fact that LECs such as SBC California change the data format once in a while to suit their own needs without regard to the effect it has on receiving LECs such as WorldCom, the technology and the processes are generally the same throughout the industry. Moreover, the computer equipment and storage technology has gotten cheaper and the process has been automated. As with the telecommunications industry as a whole, most changes in technology or processes are implemented to accommodate new efficiencies and reduce overall cost. Moreover, the providers of DAL, LECs such as SBC California or even the former GTE (now Verizon), should realize cost savings as they achieve economies of scale by consolidating resources under their regional parents SBC and Verizon respectively. These cost savings should be reflected in the price of the directory assistance listing data services provided by these ILECs..

IV. CONCLUSION

26. This concludes my declaration.

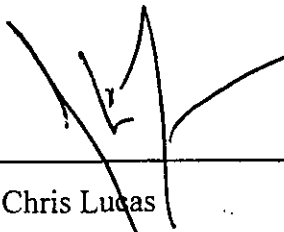
I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct to the best of my knowledge.

Dated this 16th day of April, 2003 at Ashburn, Virginia.


Edward J. Caputo

CERTIFICATE OF SERVICE

I, Chris Lucas, hereby certify that copies of the foregoing "Comments of LSSi Corp., Metro One Telecommunication, Inc. and WorldCom Inc. on the SBC Pacific Bell Amended Directory Assistance Listing Information Service ("Dalis") Cost Study" have been served on the following persons, by United States mail, on the service list for R.95-04-043, this 17th day of April, 2003.



Chris Lucas

CALIFORNIA PUBLIC UTILITIES COMMISSION

Service Lists

Proceeding: R9504043 - PUC - OIR INTO COMPE

Filer: PUC-LOCAL EXCHANGE SERVICE

List Name: LIST

Last changed: April 15, 2003

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